

Adkins, Wendy

From: Adkins, Wendy
Sent: Wednesday, January 17, 2024 2:53 PM
To: Sean Cook
Subject: RE: Farah

Hi Sean,

I am following up on my e-mail below. We need an updated stipulation re: Plaintiff's discovery responses or I will need to file a motion to compel on Plaintiff's discovery responses by Monday (which will be based on my meet and confer letter). Just let me know. Thanks!

Wendy Adkins | Member | [JACKSONKELLY^{PLLC}](#)
3000 Swiss Pine Way, Suite 200 | Morgantown, WV 26501 | www.JacksonKelly.com
Office: (304) 284-4136 | Fax: (304) 284-4142 | wgadkins@JacksonKelly.com

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From: Adkins, Wendy
Sent: Monday, January 15, 2024 9:54 AM
To: Sean Cook <swcook1215@gmail.com>
Subject: RE: Farah

Sean,

Good morning! We've both been tied up with the Radwan matter, but I didn't want to lose track of Farah's supplemental discovery responses. Below you mentioned that Dr. Radwan had been out of the country and that you needed until December 29 to supplement. Can you supplement his responses by January 26 and then we can extend our deadline for a motion to compel to February 26? If that works, I will prepare an updated stipulation to file with the Court.

Per the scheduling order, we also need to agree upon a mediator for this matter today, but we don't have to mediate until May 1, 2024. I'm fine with using Monica Haddad, Charles Piccirillo, or Steve Dalesio for this one. Just let me know your preference, and we will get the notice filed with the Court.

Thanks!

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From: Sean Cook <swcook1215@gmail.com>
Sent: Friday, December 22, 2023 5:53 PM
To: Adkins, Wendy <wgadkins@JacksonKelly.com>
Subject: Re: Farah

Agree!

On Fri, Dec 22, 2023 at 4:29 PM Adkins, Wendy <wgadkins@jacksonkelly.com> wrote:

Sean,

I am fine with pushing your supplementation deadline with your agreement that we may have to push our deadline to file a motion to compel by the same amount of time. Thanks!

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From: Sean Cook <swcook1215@gmail.com>
Sent: Friday, December 22, 2023 5:14 PM
To: Adkins, Wendy <wgadkins@JacksonKelly.com>
Subject: Re: Farah

Hi Wendy! I am sorry I did not reach out to you previously, but Dr. Farah has been out of the country for an extended time and also attending job fairs across the country. Do you mind if we submit by next Friday? We have the agreed order that allows you to still file a Motion to Compel if necessary, but I hope that we can avoid the necessity to do so. Thanks and Happy Holidays!

Sean

On Fri, Dec 22, 2023 at 4:10 PM Adkins, Wendy <wgadkins@jacksonkelly.com> wrote:

Hi Sean,

Did you e-mail your supplemental discovery responses in Farah yesterday? If so, it did not come through to me. Thanks!

Wendy Adkins | Member | **JACKSONKELLY_{PLLC}**
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From: Sean Cook <swcook1215@gmail.com>
Sent: Friday, December 8, 2023 3:15 PM
To: Adkins, Wendy <wgadkins@JacksonKelly.com>
Subject: Farah

EXTERNAL MESSAGE

Hi Wendy! Do you plan on providing your discovery responses in electronic form? This would be the medium preferred by Plaintiff. Many thanks!

Sean